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October 6, 2021

Hon. Valerie E. Caproni  
United State District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: United States v. Salifou Conde  
19 Cr. 808 (VEC)

Hon. Valerie E. Caproni:

**MEMO ENDORSED**

USDC SDNY  
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ELECTRONICALLY FILED  
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I am counsel for Salifou Conde, who was remanded on June 29, 2021, after a jury convicted him of the three counts in the indictment.

Mr. Conde has requested that I renew his application for bond pending sentence, and he requests release to home detention with electronic monitoring. Mr. Conde's mother, Nisra Toure, was diagnosed with breast cancer. She is currently living alone at 58 Stegman Street, 2<sup>nd</sup> floor, Jersey City, New Jersey, 07305. Mr. Conde learned about this diagnosis yesterday when his sister-in-law advised him about it after a visit. Nobody is available to take care of Mr. Conde's mother, and he requests release to live with her and assist her.

The same four cosigners we proposed in our last bond application (Abdoul Soumah, Amara Camara, Shaquana Nicole Edwards, and Aminata Conde) are still willing to sign. Prior to the last bond hearing, on July 21, 2021, we provided contact information and documents for those four cosigners to the United States Attorney's Office.

Sincerely,

/s/

Donald J. Yannella, Esq.

Mr. Conde's application for bond pending sentencing is DENIED.

Sentencing will proceed, as scheduled, on **November 17, 2021** with the parties' sentencing submissions due **November 3, 2021**.

SO ORDERED.

 10/6/2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE